



U.S. Department of Justice

United States Attorney
Southern District of New York

APPLICATION GRANTED
 The Silvio J. Mollo Bu.
 One Saint Andrew's Pl
 New York, New York 10007
 SO ORDERED *Ver Brod*
 VERNON S. BRODERICK

June 17, 2020 U.S.D.J. 6/22/2020

By ECF

The Honorable Vernon S. Broderick
 United States District Judge
 Southern District of New York
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

Re: *United States v. Darrel Harris, 19 CR 300 (VSB)*

Dear Judge Broderick,

The Government respectfully writes on behalf of the parties to advise the Court that the parties do not believe a hearing is required on the defendant's pending release motion filed on May 15, 2020 and that the defendant does not request such a hearing. Separately, the Government writes on behalf of the defendant to request an extension of the current briefing schedule on the defendant's pending suppression motion filed on March 9, 2020. In particular, the defendant requests that the date for any reply be extended from May 29, 2020 to July 17, 2020. The Government does not object to this request and joins with the defendant in further requesting that the Court schedule a status conference on the fully-briefed motion during the week of July 27, 2020 or whenever thereafter is most convenient for the Court. Finally, with the consent of the defendant, the Government requests that the Court exclude time under the Speedy Trial Act from June 17, 2020 through the date of the status conference pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the interests of the public and the defendant in a speedy trial are outweighed here by the interests of the defendant in having further time to brief fully the defendant's pending suppression motion for the consideration of the Court amidst the conditions of the ongoing national emergency.

Respectfully submitted,

GEOFFREY S. BERMAN
 United States Attorney

By: *Thomas John Wright*
 Thomas John Wright
 Assistant United States Attorney
 (212) 637-2295

cc: Robert Baum (Federal Defenders of New York, Inc.) (by ECF)
 Christopher Flood (Federal Defenders of New York, Inc.) (by ECF)
 Tamara Giwa (Federal Defenders of New York, Inc.) (by ECF)

The status conference scheduled for June 17, 2020 is hereby adjourned. A motion hearing is scheduled for July 27, 2020 at 10:00 a.m. The adjournment is necessary to allow the parties time to fully brief the defendants pending suppression motion amidst the conditions of the ongoing national emergency surrounding COVID-19. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between June 17, 2020 and July 27, 2020 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161 (h)(7)(A), in the interest of justice.